

1 MONTGOMERY Y. PAEK, ESQ., Bar # 10176  
2 ETHAN D. THOMAS, ESQ., Bar # 12874  
3 EMIL S. KIM, ESQ., Bar # 14894  
4 LITTLER MENDELSON, P.C.  
5 3960 Howard Hughes Parkway  
Suite 300  
6 Las Vegas, NV 89169-5937  
Telephone: 702.862.8800  
Fax No.: 702.862.8811  
Email: [mpaek@littler.com](mailto:mpaek@littler.com)  
Email: [edthomas@littler.com](mailto:edthomas@littler.com)  
Email: [ekim@littler.com](mailto:ekim@littler.com)

7  
8 *Attorneys for Defendant*  
CITY OF HENDERSON

9  
10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12  
13 KELLY WOODBURN, THOMAS  
WOODBURN, and JOSHUA  
14 RODRIGUEZ individually and on behalf  
of all others similarly situated,

15 Plaintiffs,  
16 vs.

17 CITY OF HENDERSON; DOES I through  
V, inclusive; and ROE CORPORATIONS  
18 I through V, inclusive,

19 Defendants.

20 Case No. 2:19-cv-01488-JAD-VCF

21  
22 **STIPULATION AND ORDER TO EXTEND  
THE DEADLINE FOR PARTIES TO FILE  
STIPULATED DISCOVERY PLAN AND  
SCHEDULING ORDER**

23  
24 **[FIRST REQUEST]**

25 Plaintiffs KELLY WOODBURN, THOMAS WOODBURN, and JOSHUA RODRIGUEZ  
26 ("Plaintiffs"), and Defendant CITY OF HENDERSON ("Defendant"), by and through their respective  
counsel of record, do hereby stipulate and request an order extending the deadline for the parties to  
file a Stipulated Discovery Plan and Scheduling Order pursuant to [ECF No. 74] by fifteen (15) days  
from the current deadline of December 20, 2021, up to and including **January 4, 2022**. This is the  
first request for an extension of time to file a Stipulated Discovery Plan and Scheduling Order.

1       The requested extension is necessary because the case has been stayed and parties need  
2 additional time to confer regarding a revised Discovery Plan and Scheduling Order after the Court's  
3 recent rulings on various motions. *See Order Granting Plaintiffs' Motion for Collective Action,*  
4 *Denying Defendant's Motion to Compel Arbitration, and Denying Defendant's Motion to Dismiss*  
5 *[ECF No. 75]. Additionally, the parties are in the process of conferring related to a proposed stipulated*  
6 *protective order Defendant believes is necessary in the case related to discovery going forward.*  
7 *Defendant's counsel also has planned time out of the office in coming weeks for the holidays.*  
8 *Accordingly, the additional time requested will allow the parties time to confer on the protective order*  
9 *and to agree upon a revised Discovery Plan and Scheduling Order for the case going forward.*

10      The instant request is made in good faith and not for the purpose of delay.

11      Dated: December 20, 2021

12      Dated: December 20, 2021

13      CLAGGETT & SYKES LAW FIRM

14      LITTLER MENDELSON, P.C.

15      By: /s/ Joseph N. Mott

16      JOSEPH N. MOTT, ESQ.

17      *Attorneys for Plaintiffs*  
18      KELLY WOODBURN, THOMAS  
19      WOODBURN, and JOSHUA  
20      RODRIGUEZ

21      By: /s/ Ethan D. Thomas

22      MONTGOMERY Y. PAEK, ESQ.  
23      ETHAN D. THOMAS, ESQ.  
24      EMIL S. KIM, ESQ.

25      *Attorneys for Defendant*  
26      CITY OF HENDERSON

27      **IT IS SO ORDERED.**

28      Dated: December 20, 2021.



29      

---

30      UNITED STATES MAGISTRATE JUDGE

31      4869-8026-9063.1 / 080828-1020